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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD GARLAND,

Plaintiff,

v.

**LAS VEGAS METROPOLITAN,
POLICE DEPARTMENT, *et. al.*,**

Defendants.

Case No. 2:12-CV-0147-GMN-(VCF)

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND
TO DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

AND ORDER

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rules 6-1 and 7-2, Richard Garland, by and through undersigned counsel, respectfully requests that the Court grant him an extension of time, to and until June 15, 2012, to respond to Defendants' motion for judgment on the pleadings. This is Plaintiff's first request for an extension of time for the purpose set forth in this motion. Presently, Plaintiff's response to Defendants' motion for judgment on the pleadings (filed on May 3, 2012) is due on May 20, 2012. In support of this motion, Plaintiff relies upon the memorandum of points and authorities set forth below.

MEMORANDUM OF POINTS AND AUTHORITIES

In response to Plaintiff's Complaint, Defendants have filed a motion for judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12(c). Defendants' motion is predicated upon various rote legal arguments not applicable to the particular facts of this case. Although undersigned counsel has reviewed Defendants' partially dispositive motion, additional time will be needed to respond to the sundry legal arguments presented therein. Unfortunately, however, due to competing case commitments, undersigned counsel will need additional time to fully research, prepare and file a response.

Within the next two weeks, undersigned counsel will be busy preparing for a trial scheduled to commence in mid-June in state court. Additionally, during this same period of time undersigned counsel will be required to travel to Los Angeles for a settlement conference in federal court. See Bravado International v. Julian Rouas, et. al., 2:11-CV-4859-JAK-(JEM) (C.D. Cal.). Further, during the first week of June undersigned counsel is expected to respond to several discovery requests in other litigation pending in both state and federal courts, as well as prepare and file two complaints in federal court in other cases undersigned counsel is currently handling. Based upon the foregoing schedule, an extension of time, to and until June 15, 2012, will permit undersigned counsel sufficient time to respond to the motion for judgment on the pleadings.¹ Defendants will not be prejudiced by this extension of time since they have not sought to stay discovery pending resolution by the Court of their dispositive

¹ To avoid the possibility of seeking an additional extension, undersigned counsel is requesting until June 15, 2012 after taking into account counsel's various competing case commitments. The requested extension should be sufficient to permit undersigned counsel the necessary time to fully prepare and file an appropriate response to Defendants' motion.

1 motion, thereby suggesting that they believe the case should proceed forward
2 notwithstanding the issues raised in their motion for judgment on the pleadings.

3 **CONCLUSION**

4 In light of the foregoing, Plaintiff, by and through undersigned counsel,
5 respectfully requests that the Court permit Plaintiff an extension of time, to and until
6 June 15, 2012, to respond to Defendants' motion for judgment on the pleadings.

7 Respectfully submitted,

8 */s/ Paul S. Padda*

9 _____
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18 Attorneys for Richard Garland

19 Dated: May 19, 2012

20 **IT IS SO ORDERED:**

21 **Plaintiff's request for an extension of time
22 to respond to Defendant's motion for
23 judgment on the pleadings (filed May 3,
24 2012) is hereby granted. Plaintiff shall have
25 until June 15, 2012 within which time to file
26 a response.**

20 
21 _____
22 Gloria M. Navarro
23 United States District Judge

24 **DATED: 05/23/2012**